LAW OFFICE OF

## **BENJAMIN SILVERMAN**

224 WEST 30TH ST., SUITE 302 NEW YORK, NY 10001 TEL (212) 203-8074 FAX (646) 843-3938 Benjamin@bsilvermanlaw.com

March 11, 2021

By ECF

Honorable Ronnie Abrams United States District Judge Southern District of New York 40 Foley Square New York, NY 10007

Re: *United States v. Angel Martinez*, 19 Cr. 12 (RA)

Application granted.

SO ORDERED.

Ronnie Abrams, U.S.D.J.

March 12, 2021

Your Honor:

I represent Angel Martinez in the above-captioned case. I write without objection from the government and Pretrial Services respectfully to request that the Court modify Mr. Martinez's bail to permit him to travel with his family to Miami from March 24-29 to celebrate the opening of the third branch of their restaurant. If permitted, he would travel and stay with family. Mr. Martinez has complied with the terms of his release for over two years.

I conferred with AUSA Jarrod Schaeffer and Pretrial Services Officer Rena Bolin, and they both inform me that they have no objection to this request. Thank you for your consideration.

Respectfully submitted,

/s/ Benjamin Silverman
Benjamin Silverman

cc: AUSA Jarrod Schaeffer (by ECF)
Pretrial Services Officer Rena Bolin (by email)
Angel Martinez (by text)